

# Exhibit B

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**From:** Kazim Naqvi <KNaqvi@sheppardmullin.com>  
**Sent:** Wednesday, April 19, 2023 5:56 PM  
**To:** Storey, Kelley (DC); MAR\_Chambers@cacd.uscourts.gov  
**Cc:** Rena Andoh; Travis Anderson; Lai Yip; Michael Heins; RFluskey@hodgsonruss.com; Rachel.Fiset@zfzlaw.com; scott.tenley@zfzlaw.com; Ben.Heller@zfzlaw.com; catherine.thompson@halpernmay.com; grant.gelberg@halpernmay.com; alyssa.titche@halpernmay.com; kevin.scott@halpernmay.com; #C-M SKYRYSE - MOOG - LW TEAM  
**Subject:** RE: Moog Inc. v. Skyryse, Inc. et al.; Case No. 2:22-cv-09094-GW-MAR

Dear Ms. Velasco:

We are counsel for Plaintiff and Counterdefendant Moog Inc. Thank you for your e-mail. We confirm receipt and also acknowledge that we have read and understood the Court's directives regarding Local Rule 37 and Federal Rule 37. We confirm that the Parties remain at an impasse on this issue.

Respectfully Submitted,

**Kazim A. Naqvi**  
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**From:** Kelley.Storey@lw.com <Kelley.Storey@lw.com>  
**Sent:** Wednesday, April 19, 2023 1:18 PM  
**To:** MAR\_Chambers@cacd.uscourts.gov  
**Cc:** Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Michael Heins <MHeins@sheppardmullin.com>; RFluskey@hodgsonruss.com; Rachel.Fiset@zfzlaw.com; scott.tenley@zfzlaw.com; Ben.Heller@zfzlaw.com; catherine.thompson@halpernmay.com; grant.gelberg@halpernmay.com; alyssa.titche@halpernmay.com; kevin.scott@halpernmay.com; SKYRYSEMOOG.LWTEAM@lw.com  
**Subject:** RE: Moog Inc. v. Skyryse, Inc. et al.; Case No. 2:22-cv-09094-GW-MAR

Dear Ms. Velasco:

We are counsel for Defendant Counterclaimant Skyryse, Inc. Thank you for your e-mail. We confirm receipt and also acknowledge that we have read and understood the Court's directives regarding Local Rule 37 and Federal Rule 37. We also write to confirm that the parties remain at an impasse regarding whether Skyryse should be prohibited, as Moog contends, from disclosing to Skyryse's proposed expert, Mr. Vincent Socci, information designated as requiring confidential treatment by Moog under the protective order. Skyryse will comply with the relevant rules in filing its motion.

Best,  
Kelley

**Kelley Storey**

Pronouns: she/her/hers

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**From:** MARChambers <[MAR\\_Chambers@cacd.uscourts.gov](mailto:MAR_Chambers@cacd.uscourts.gov)>

**Sent:** Tuesday, April 18, 2023 11:31 AM

**To:** Storey, Kelley (DC) <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>

**Cc:** [RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com); [TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com); [LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com); [KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com); [MHeins@sheppardmullin.com](mailto:MHeins@sheppardmullin.com); [RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com); [Rachel.Fiset@zfzlaw.com](mailto:Rachel.Fiset@zfzlaw.com); [scott.tenley@zfzlaw.com](mailto:scott.tenley@zfzlaw.com); [Ben.Heller@zfzlaw.com](mailto:Ben.Heller@zfzlaw.com); [catherine.thompson@halpernmay.com](mailto:catherine.thompson@halpernmay.com); [grant.gelberg@halpernmay.com](mailto:grant.gelberg@halpernmay.com); [alyssa.titche@halpernmay.com](mailto:alyssa.titche@halpernmay.com); [kevin.scott@halpernmay.com](mailto:kevin.scott@halpernmay.com); #C-M SKYRYSE - MOOG - LW TEAM <[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)>

**Subject:** RE: Moog Inc. v. Skyrise, Inc. et al.; Case No. 2:22-cv-09094-GW-MAR

Good morning,

Per the Court: The parties have leave to file a motion without a telephonic conference, but only after both parties have replied to this email acknowledging they have read and understood the following:

Though a pre-motion telephonic conference is not required, parties must still comply with all the requirements of Local Rule 37 and Fed. R. of Civ. P. 37 in filing their motion. The parties are encouraged to promptly agree to some type of resolution of the dispute before filing motions. Note that, going forward, if any dispute between the parties proceeds to motion practice, the Court will be required to consider the application of the fee-shifting provisions of Federal Rule of Civil Procedure 37(a)(5). That rule generally requires the Court to assess fees against a losing party in a discovery motion unless that side's conduct was substantially justified or circumstances would make a fee-shift unjust. The fees can be imposed against the losing party's attorney, the party itself, or both. Also, moving forward, all hearings will be in-person; requests for zoom or telephonic appearances must be made at least five days in advance of the hearing, and will only be granted upon a showing of good cause.

In any discovery motion, the parties should include a statement explaining why this discovery dispute should or should not also be subject to Judge McCarthy's order staying discovery until the trade secret identification has been satisfied. If the trade secret identification has been satisfied, the parties should notify the Court.

Thank you.



**VALERIE VELASCO**

COURTROOM DEPUTY TO THE HONORABLE MARGO A. ROCCONI

**UNITED STATES DISTRICT COURT  
CALIFORNIA CENTRAL DISTRICT COURT**

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**From:** [Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com) <[Kelley.Storey@lw.com](mailto:Kelley.Storey@lw.com)>

**Sent:** Friday, April 7, 2023 9:25 AM

**To:** MARChambers <[MAR\\_Chambers@cacd.uscourts.gov](mailto:MAR_Chambers@cacd.uscourts.gov)>

**Cc:** [RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com); [TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com); [LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com); [KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com); [MHeins@sheppardmullin.com](mailto:MHeins@sheppardmullin.com); [RFluskey@hodgsonruss.com](mailto:RFluskey@hodgsonruss.com); [Rachel.Fiset@zfzlaw.com](mailto:Rachel.Fiset@zfzlaw.com); [scott.tenley@zfzlaw.com](mailto:scott.tenley@zfzlaw.com); [Ben.Heller@zfzlaw.com](mailto:Ben.Heller@zfzlaw.com); [catherine.thompson@halpernmay.com](mailto:catherine.thompson@halpernmay.com); [grant.gelberg@halpernmay.com](mailto:grant.gelberg@halpernmay.com); [alyssa.titche@halpernmay.com](mailto:alyssa.titche@halpernmay.com); [kevin.scott@halpernmay.com](mailto:kevin.scott@halpernmay.com); [SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)

**Subject:** RE: Moog Inc. v. Skyrise, Inc. et al.; Case No. 2:22-cv-09094-GW-MAR

**CAUTION - EXTERNAL:**

Dear Ms. Velasco,

We represent Defendant and Counterclaimant Skyrise, Inc. in the above-captioned matter and write to inquire about scheduling a telephonic conference regarding the below dispute related to the protective order, for which the parties are at an impasse. As noted below, this issue affects Skyrise's ability to respond to currently-pending motions in the case, and Skyrise believes that this issue is ripe and should not be deferred until Moog sufficiently identifies its trade secrets.

Thank you,  
Kelley

**Kelley Storey**  
Pronouns: she/her/hers

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**From:** Storey, Kelley (DC)  
**Sent:** Thursday, March 30, 2023 7:59 PM  
**To:** 'mar\_chambers@cacd.uscourts.gov' <[mar\\_chambers@cacd.uscourts.gov](mailto:mar_chambers@cacd.uscourts.gov)>  
**Cc:** Rena Andoh <[RAndoh@sheppardmullin.com](mailto:RAndoh@sheppardmullin.com)>; Travis Anderson <[TAnderson@sheppardmullin.com](mailto:TAnderson@sheppardmullin.com)>; Lai Yip <[LYip@sheppardmullin.com](mailto:LYip@sheppardmullin.com)>; 'Kazim Naqvi' <[KNaqvi@sheppardmullin.com](mailto:KNaqvi@sheppardmullin.com)>; Michael Heins <[MHeins@sheppardmullin.com](mailto:MHeins@sheppardmullin.com)>; RFluskey@hodgsonruss.com; Rachel Fiset <[Rachel.Fiset@zfzlaw.com](mailto:Rachel.Fiset@zfzlaw.com)>; Scott Tenley <[scott.tenley@zfzlaw.com](mailto:scott.tenley@zfzlaw.com)>; Ben Heller <[Ben.Heller@zfzlaw.com](mailto:Ben.Heller@zfzlaw.com)>; Catherine Thompson <[catherine.thompson@halpernmay.com](mailto:catherine.thompson@halpernmay.com)>; Grant Gelberg <[grant.gelberg@halpernmay.com](mailto:grant.gelberg@halpernmay.com)>; #C-M SKYRYSE - MOOG - LW TEAM <[SKYRYSEMOOG.LWTEAM@lw.com](mailto:SKYRYSEMOOG.LWTEAM@lw.com)>  
**Subject:** Moog Inc. v. Skyrise, Inc. et al.; Case No. 2:22-cv-09094-GW-MAR

Dear Ms. Velasco,

We represent Defendant and Counterclaimant Skyrise, Inc. in the above-captioned matter and write pursuant to Judge Rocconi's discovery procedures to seek a telephone conference with the Court to discuss the below discovery issue for which the parties are at an impasse. Because the below dispute relates to the already-ordered protective order in the case and to Skyrise's ability to respond to currently-pending motions in the case, Skyrise believes that this issue is ripe and should not be deferred until Moog sufficiently identifies its trade secrets.

Consistent with our prior emails to the court, the parties have agreed upon the following three proposed times for a telephone conference: April 5 from 11 am-3 pm, April 6 from 9-11 am and after 1:30 pm, and April 7 from 10 am-12 pm.

The issue Skyrise intends to discuss during the conference is:

Whether Skyrise should be permitted to disclose to Skyrise's proposed expert, Mr. Vincent Socci, information designated by Moog under the protective order. Moog has purported to object to this disclosure on the basis that Mr. Socci did contract work for Moog nearly 15 years ago through his employment with On Target Motion, on programs that Moog claims are at issue in this case. Skyrise maintains that disclosure of confidential material to Mr. Socci is proper under the protective order, and that Moog has not born its burden "of proving that the risk of harm the disclosure

would entail (under the safeguards proposed) outweighs [Skryse's] need to disclose the Protected Material to the expert." Dkt. 89 at § 6.6.

Best,  
Kelley

**Kelley Storey**

Pronouns: she/her/hers

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